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# Care Labeling and the Fabric Care Industry

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**T**he International Fabricare Institute (IFI) is a trade association for professional dry cleaners and launderers. IFI's membership is primarily comprised of dry cleaners—approximately 6,000—but we also have members from Better Business Bureaus, retailers, educators, allied trades, and apparel and textile manufacturers. IFI is affiliated, or works closely with local and state drycleaning associations as well as the Neighborhood Cleaners Association-International (NCA-I). NCA-I has approximately 4,000 dry cleaning members. It is estimated that there are between 30-35,000 dry cleaning plants in the United States. Since many of the members we represent have more than one operating plant, I am confident in saying that we represent the interests of the dry cleaning industry.

Professional cleaners depend on care labels. Their ability to provide to consumers a quality, serviceable garment depends on the care label providing accurate, and complete information. Cleaners are professionals. They have a working knowledge of fabrics. There's no way, however, that they can test each and every component which goes into manufacturing a garment to see how it will respond to cleaning. The dyes, fabric finishes, trims, interfacings, interlinings, and linings are often not visually or readily indentifiable as presenting problems during cleaning. As Carl Priestland indicated, in most tailored garments, there are five to six fibers and fabrics that go into the inner workings of a garment. Think of your local dry cleaner, of who that business person is. He's usually not a textile graduate. About one-third of our industry is now Korean owners. They have an additional barrier with the language problem. So, yes, dry cleaners are professionals. No, dry cleaners cannot be expected to figure out how every single gar-

ment can be processed. That is why the Federal Trade Commission (FTC) requires the garment manufacturer to determine the appropriate method of care. The manufacturer has the resources available to evaluate each and every component that goes into the make-up of a garment. This is especially true as new processes are being looked at and developed for the cleaning of textiles.

Unfortunately, what the fabricare industry experiences is that the method of care specified is not always appropriate for the garment. All too often the following scenario occurs:

A customer's garment is damaged in cleaning even though the dry cleaner followed the care instructions. Because the care instructions were followed the cleaner informs the customer that they should return the garment to the retailer because the manufacturer did not provide adequate or proper instructions. The retailer tells the customer, "If the dry cleaner were a professional and handled the garment properly it would not have been damaged." The customer then returns to the dry cleaner unsatisfied and, to say the least, unhappy. The dry cleaner pays the customer, not because he felt he was responsible, but to retain the business. Still, the customer often loses faith in the dry cleaner's ability to do a good job.

The average dry cleaner has an average yearly revenue of \$200,000 with a profit margin of 2-3 percent. The above referenced scenario cannot happen too many times before that profit is seriously depleted.

## Garment Damage

As I stated, the fabricare industry does find that garments are damaged all too often even when the care instructions are followed. Both IFI and NCA-I each house an analysis laboratory which attempts to ascertain how damage to a garment occurred and if that damage could have been prevented. Consistently, over the years, the highest percentage of garments received in IFI's laboratory have been damaged as the result of inaccurate or incomplete care labeling. Statistics from NCA-I's analysis laboratory support IFI's experience.

IFI developed a database which is regularly shared with the FTC. The database contains garment manufacturer name, RN Number, fiber content, country of origin, garment description, and damage type. In the past IFI has shared information in the database not only with the FTC but with apparel and textile manufacturers. NCA-I has made available to the FTC photos of damaged garments and corresponding care labels as well as the analysis laboratory report.

As an educational tool for the dry cleaner to use with consumers, IFI and NCA-I produce bulletins which give details on garments which have been damaged during cleaning. These are garments which the laboratory has received a number of times. IFI's bulletin "Not In Vogue" provides photos as well as a description of the garment. In addition it gives the results of IFI's contact with the manufacturer. In most cases IFI has found that the manufacturer is more than willing to work with the consumer either in the form of a refund or replacement.

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## Fabricare Industry's Involvement in Care Labeling

Because the fabricare industry is so dependent on care labels providing accurate information, IFI has made sure that it has played a role in the development of the FTC's Care Labeling Rule. Industry members have provided not only written comments but oral testimony, both prior to the adoption of the Care Labeling Rule in 1972 and in the years leading up to the FTC's

revision in 1984. Members of the fabricare industry are active members of the textile organizations influencing care labeling both in the United States (American Association for Textile Chemists and Colorists and American Society for Testing and Materials) and internationally (International Organization for Standards).

The fabricare industry has long held the position that alternative labeling should be required. That the care label should provide all appropriate methods, not just one which may not even be the best care method for the garment. Providing all methods of care gives not only the consumer, but the professional cleaner the option of choosing how that garment should be handled. The availability and breadth of options becomes especially important when discussing alternatives to dry cleaning, specifically wet cleaning. Unless an alternative is a 100 percent replacement, the fabricare industry would have trouble. It couldn't financially accept the liability of cleaning a garment unless the procedure is recommended on the care label.

Another position the fabricare industry strongly believes in and continually works for is that the reliable evidence requirements of the Care Labeling Rule be strengthened. Currently the Rule states that "the manufacturer must establish a reasonable basis for the care information." "Reasonable basis" includes: tests, current technical literature, past experience, and industry experience. The information can be subjective as well as objective; testing is not required. That results in a number of garments being damaged after cleaning. This is a disservice not only to consumers, but also to the fabricare industry. Professional cleaners are experiencing financial losses, not only because of reimbursement to the customer for a garment, but also more seriously because of the loss of consumers' trust and future business.

Manufacturers need to be held accountable and responsible for the care information they provide. The FTC needs to do a better job of enforcing the requirements of the Care Labeling Rule. Since its inception, the FTC has only prosecuted a handful of companies for violation of the Care Labeling Rule while thousands of consumers have had the unfortunate experience of having a garment damaged after cleaning.

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## Industry's Position on Care Labeling

- Support Alternative Labeling
- Strengthen “Reasonable Basis” Requirements

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# Fabric Care Industry's Involvement

- Oral Testimony
- Written Testimony
- FTC Access to Database
- Active Member of AATCC, ASTM, and ISO
- Participate in DfE Program

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## IFI Damage Analysis Statistics

Year	Total Garments Received	Approx. % of Damage Attributed to Inaccurate Care Labeling
1988	43,658	45%
1989	44,293	41%
1990	46,906	38%
1991	46,760	41%
1992	44,080	41%
1993	36,294	33%
1994	30,349	35%
1995	25,160	41%